

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAROL BLANCHARD, EXECUTIVE
DIRECTOR of the TEAMSTERS UNION 25
HEALTH SERVICES & INSURANCE PLAN,

Plaintiff,

v.

APA TRANSPORT CORPORATION,

Defendant.

FILING FEE PAID:
RECEIPT # 09/30
AMOUNT \$ 50.00
BY DPTY CLK FDW
DATE 12/23/05

CASE No. 05-11880-GAO

FILED
Clerk's Office
USDC, Mass.
Date 12/23/05
By [Signature]
Deputy Clerk

UNOPPOSED MOTION FOR
ADMISSION OF ATTORNEY PRO HAC VICE

The Defendant, APA Transport Corporation, hereby moves, in accordance with Local Rule 83.5.3(b), that Keith R. McMurdy, Esq., of the law firm of Grotta, Glassman & Hoffman, P.A., 75 Livingston Avenue, Roseland, New Jersey 07068, be allowed to appear and practice in this Court on the Defendant's behalf in the above-captioned matter.

In support of this Motion, the Defendant refers to the Affidavit of Keith R. McMurdy, attached hereto as Exhibit A, in which he certifies: 1) that he is a member in good standing in every jurisdiction in which he has been admitted to practice and before every court to which he has been admitted, including the Courts of the States of New Jersey, New York, Michigan and Ohio, as well as the Bars of the United States Supreme Court, the United States Courts of Appeals for the Third and Sixth Circuits, and all of the District Courts in New Jersey, New York, Michigan and Ohio, and is a member of those Bars in good standing; 2) that he has been admitted to appear pro hac vice in this Court on behalf of the Defendant in a different case, *Teamsters Local Union 25 v. APA Transport Company*, Civil Action No. 03-11493-MLW, which is currently pending before Magistrate Judge

Sorokin on referral; 3) that there are no disciplinary proceedings pending against him as a member of the Bar in any jurisdiction; and 4) that he has reviewed and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

This Motion is made on the Defendant's behalf by John M. Simon, a member of the bar of this Court, who has already appeared in this action as counsel for the Defendant. Mr. Simon contacted counsel for plaintiff in this matter, Brian P. Fox, Esq., who does not oppose this motion.

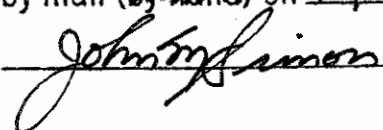
Respectfully submitted,

APA TRANSPORT CORPORATION

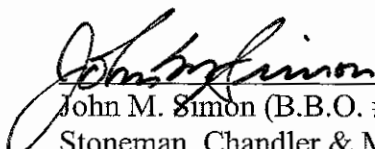
By its attorney,

Certificate of Service

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (~~by hand~~) on 12/22/05.



John M. Simon

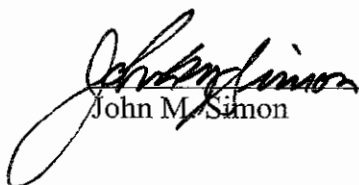


John M. Simon (B.B.O. #645557)
Stoneman, Chandler & Miller LLP
99 High Street
Boston, MA 02110
(617) 542-6789

Dated: December 22, 2005

Certification Pursuant to Local Rule 7.1(A)(2)

I hereby certify that, pursuant to Local Rule 7.1(A)(2), I have conferred with opposing counsel regarding the subject matter of this Motion in a reasonable and good faith attempt to resolve this matter before filing this Motion and that opposing counsel has granted me permission to indicate herein that he does not oppose this motion.



John M. Simon

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAROL BLANCHARD, EXECUTIVE
DIRECTOR of the TEAMSTERS UNION 25
HEALTH SERVICES & INSURANCE PLAN,

Plaintiff,

v.

APA TRANSPORT CORPORATION,

Defendant.



CASE No. 05-11880-GAO

AFFIDAVIT OF KEITH R. McMURDY

I, Keith R. McMurdy, hereby depose and state as follows:

1. I make this affidavit in support of a motion to admit me *pro hac vice* in this matter to represent the Defendant.

2. I am a Principal member of the law firm of Grotta, Glassman & Hoffman, P.A., 75 Livingston Avenue, Roseland, New Jersey 07068. Grotta, Glassman & Hoffman has a long-standing relationship with the Defendant of more than 10 years and I have personally represented it in many matters for over 3 years. Because of these lengthy relationships, the Defendant has asked that my firm and I represent it in this matter, which was filed in this Court on or about September 10, 2005.

3. I am a member of the bar in good standing in every jurisdiction in which I have been admitted to practice, and before every court that has admitted me. More specifically, I have been admitted to practice before the Courts of the States of New Jersey, New York, Michigan and Ohio. Further, the following federal courts have admitted me to practice as a member of their respective bars: the United States Supreme Court, United States Courts of Appeals for the Second, Third, and Seventh Circuits, and federal district

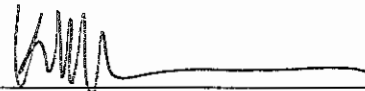
courts in New Jersey, New York, Michigan, Colorado and Ohio.

4. On or about March 5, 2004, I was admitted to appear pro hac vice in this Court on behalf of the Defendant in a different case, *Teamsters Local Union 25 v. APA Transport Company*, Civil Action No. 03-11493-MLW. I continue to represent the Defendant in that case, which is currently before Magistrate Judge Sorokin on referral.

5. I am not now, nor have I ever been, the subject of any disciplinary proceedings as a member of the bar in any jurisdiction.

6. I have reviewed and become familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Executed under the pains and penalties of perjury this 15th day of December, 2005.



Keith R. McMurdy

Certificate of Service

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (~~by hand~~) on 12/22/05.

